

APR 19 2013

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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

GERALD REED)
Plaintiff)

vs.)

Perry Kirk)
Defendant)

CASE No: 12 C 8582

Presiding Judge:
JAMES B. ZAGEL

MOTION For Preliminary Injunction / Restraining Order

Now Comes Plaintiff GERALD REED pro-se. Asking this Honorable Judge, JAMES B. ZAGEL, to GRANT A COURT ORDER. RESTRAINING PERMENT THAT PREVENTS DEFENDANT MT. PERRY KIRK FROM FURTHERING HARASSING AND THREATING PLAINTIFF. BECAUSE OF THE COMPLAINT AGAINST DEFENDANT.

Plaintiff will demonstrate that on numerous occasions DEFENDANT HAS CAUSE THREATS AND HARASSMENTS TOWARDS PLAINTIFF. TO ~~SCARE~~ PLAINTIFF. WITH SEGREGATION AND/OR DISCIPLINARY ACTIONS. OF SOME TYPE OF RETIBATION OF SOME SORT.

1.) On April 14th 2013, Plaintiff was entering the Dining Hall for lunch. When MT. KIRK (DEFENDANT) WALKED UP IN PLAINTIFF FACE THREATING HIM. IF HE DON'T GET OFF THE YENCE TALKING HE WOULD WALK HIM TO SEGREGATION.

2.) Plaintiff HAD NOT LEAN OR STOPPED ON THE YENCE TO TALK WITH ANYONE. PLAINTIFF WAS PLAINLY WALKING IN THE DINING HALL TO OBTAIN HIS CHOW AS HE OFTEN DO. WHEN HE COMES OUT FOR CHOW.

3.) Plaintiff MOST TIMES STAYS IN HIS CELL TO AVOID THE HARASSMENT AND THREATS. AND/OR REFUSE TO NOT PUT ANY MORE PAIN AND STRAIN ON HIS LEG AND HIP. WHICH GIVES HIM SEVER PAIN DAILY.

4.) Plaintiff is subjected to the use of two crutches every time that he goes to the Dining Hall. A friend and/or a kind prisoner assist in helping Plaintiff with his tray/food to the table.

5.) On this date April 14th. Defendant plainly sees that Plaintiff has two crutches and can't grab his own food/tray. And refuse to allow another prisoner to grab two trays. One for himself and one for me. As it is often done. When Plaintiff goes to the Dining Hall.

6.) Most days the Lt. that's in the Dining Hall allow this process to go forth. Someone else assisting Plaintiff with his tray. Even the food supervisor. Ask that someone assist a disabled person. Because that person is unable to hold on to two crutches and grab his own tray.

7.) This Defendant further harass Plaintiff, when he walks pass Plaintiff's cell each time. He constantly make derogatory comments towards Plaintiff and/or yell knowing Plaintiff is sleep, waking Plaintiff up, and stare at Plaintiff.

Wherefore Plaintiff ask this Honorable Judge to in place a permanent injunction or a preliminary injunction. That Defendant Lt. Kirk. be separated from Plaintiff by giving GERARD REED a restraining order. And placing Defendant in MHC. STATEVILLE CORR. Center. Is separated in two facility one for maximum facility and the other part is for intake / RITs / MSC ETC. AND Plaintiff is only requesting that Plaintiff be granted this injunction to prevent any further harassments, threats, and in fear of his life

DATE April 17th 2013

Notify

I, GERARD REED, depose and state under the penalty of perjury, pursuant to 735 ILCS 5-1-109 of the Code of Civil Procedures that the foregoing is true and correct.

Submitted Gerard Reed

GERARD REED pro-se

N-32900

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